

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

v.

No. 5:18-cr-00171-001

SARAH NORTON

DEFENDANT’S PROPOSED VOIR DIRE

Defendant, Sarah Norton, by and through her undersigned counsel, hereby submits the attached proposed voir dire, in accordance with the Court’s recent trial order.

Respectfully submitted,

Dated: October 14, 2019:

/s/ David Jay Glassman, Esquire
David Jay Glassman, Esquire
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PROPOSED VOIR DIRE QUESTIONS

1. Have any of you ever seen or heard anything about this case from any source whatsoever?
2. If there are any matters that you would rather discuss privately that may affect your ability to be a fair and impartial juror, please let the Court know.
3. Does anyone know any victims of sexual misconduct?
4. Does anyone know anyone who has been accused of sexual misconduct?
5. Have you or any members of your family, including brothers, sisters, parents or children, or close friends ever been the victims of criminal conduct such that you would not be a fair and impartial juror in this case?
 - a. If yes, please explain, including what the incident was, what police agency investigated, did you have to make a statement, and whether the responsible party apprehended, and why that experience prevents you from being a fair and impartial juror in this case.
6. Most people or their family or close friends have been victims of minor crimes, such as burglary, auto theft, and auto accidents involving impaired drivers. Have you or any members of your family, including brothers, sisters, parents or children, or close friends ever been the victims of serious criminal conduct?
7. Are any of you or any members of your family or close friends now serving or have ever served in the capacity of law enforcement officer?
 - b. Please note that in the definition of law enforcement officer, I am including not only police officers, but also employees of law enforcement agencies, military police, INS, border patrol, DEA, ATF, DOJ, Department of Homeland Security, or other government law enforcement or intelligence agency etc.
8. Do you think this relationship would prevent you from being fair and impartial in this case?

9. There will be witnesses called during this trial who are members of law enforcement and who may have been in that profession for a number of years.
 - c. Is there anything about the law enforcement profession and/or about the witness having been engaged in such profession for a number of years that would cause you to give greater weight or credibility to their testimony, by virtue of their employment in law enforcement?
10. Have any of you or members of your family been a party or witness in any litigation (excluding domestic relations, traffic, or probate)? Do you think this experience would prevent you from being fair and impartial in this case?
11. Have any of you or members of your family been a party or witness in any litigation (excluding family law matters, traffic cases, and probate matters)?
 - d. [Addressed to all who answer yes:] Do you think this experience would prevent you from being fair and impartial in this case?
 - e. [Addressed individually:] What kind of a case were you a witness in, and which party called you as a witness?
12. Do any of you or any of the members of your family have any legal training?
 - f. [Addressed to all who answer yes:] Do you think this training would affect your ability to be fair and impartial in this case?
 - g. [Addressed individually:] What was your legal training?
13. Are there some situations where sexual behavior between parties is wrong simply because of their relationship? Examples (teacher/student, coach/team member, minister/congregant, adult/child). What makes these types of relationships wrong? Can they ever be equal?
14. For all panel members, are you willing and able to find Sarah Norton not guilty of the charged offenses if the prosecution fails to prove its case beyond a reasonable doubt?

15. Knowing how serious the charged offenses are in this case, are each of you prepared to find Sarah Norton not guilty if the Government fails to produce sufficient evidence?
16. If Sarah Norton calls witnesses at and presents evidence on her behalf, does everyone agree that you will consider this evidence just as you would evidence presented by the prosecution?
17. Do any of you have any other reason whatsoever, such as a physical difficulty, a health problem or home problems that might interfere with your serving as a fair and impartial juror in this case?